LYNN
WATER & SEWER COMMISSION
400 Parkland Avenue • Lynn, Massachusetts 01905-1138 • (781) 596-2400 • Fax (781) 595-1420

March 1, 2022

EPA New England
Attn: Justin Pimpare
5 Post Office Square
Suite 100 OEP 06-03
Boston, MA 02109

Dear Mr. Pimpare,

Enclosed please find the EPA Region 1 Annual Pretreatment Report for the Lynn Water and Sewer Commission's Industrial Pretreatment Program (IPP). The report has been prepared in accordance with the Commission's NPDES Permit # MA0100552, and covers the 2021 Pretreatment year for the period of February 1, 2021 – January 31, 2022.

Should you have any questions or require additional information please do not hesitate to contact me at (781) 596-2400 x 204.

Sincerely,

Joseph Beauchesne
Engineer, IPP Coordinator
Lynn Water and Sewer Commission
400 Parkland Avenue
Lynn, MA 01905

cc: Anthony J. Marino, P.E.
Daniel F. O'Neill, P.E.
Thomas Mahin, N.E. Regional DEP w/enclosures

Lynn Water and Sewer Commission
Industrial Pretreatment Program

NPDES Permit: MA 0100552

Annual Report
2021 Reporting Period
February 1, 2021 – January 31, 2022

Respectfully Submitted by:
Joseph Beauchesne
Engineer, Pretreatment Coordinator

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Item 1. Narrative Description of Pretreatment Program

The Lynn Water and Sewer Commission continued to monitor and enforce the Industrial Pretreatment Program during the 2021 reporting year. The Commission's contractors Veolia Water and Suez Water inspected and sampled each industrial user during the reporting year to monitor their activities and discharge constituents per a 20-year contract agreement. The agreement began in July of 2001 with Veolia, and was transitioned to Suez during the contract changeover, which began in July of 2021. A copy of Appendix 14 to both agreements, outlining Veolia and Suez responsibilities to the Commission, is included in this report as Appendix A.

A surcharge system is utilized to recoup costs associated with treating excess BOD and TSS. Individual BOD and TSS limits are defined in each user's Industrial Wastewater Discharge Permit. Users discharging waste streams to the POTW with concentrations in excess of 300 mg/l for BOD and TSS are surcharged based on the actual pounds discharged. The Commission has and will continue to rely upon sampling, inspections, meetings, phone calls, and correspondence to obtain information pertaining to industry compliance.

The Commission's Enforcement Response Plan (ERP) was formally approved by EPA on August 3, 1995, and adopted by the Commission on November 20, 1995.

The Commission's present staffing has been adequate in enforcing the Pretreatment Program. The Commission has utilizes the services of one Engineer and Veolia/Suez Water personnel for pretreatment implementation and enforcement. Veolia/Suez Water provides contract services for sample collection, analysis, and inspectional services. (See Appendix A)

For spill containment and spill cleanup the Commission contracts either Clean Harbors, or Enpro Services, Inc. The Commission may also utilize the services of CDM Smith to provide technical assistance on an as-needed basis. The Commission continues to use the legal services of Samuel Vitali, Esq. and Attorney Stephen Kiley to assure continued compliance with EPA regulations.

Item 2. EPA Region 1 Annual Pretreatment Report Summary Sheet

POTW Name:	Lynn Regional Wastewater Treatment Plant
NPDES Permit #:	MA0100552
Pretreatment Report Period Start Date:	February 1, 2021
Pretreatment Report Period End Date:	January 31, 2022

Industry Information

# of Significant Industrial Users:	5
# of SIUs without Control Mechanisms:	0
# of SIUs not Inspected:	0
# of SIUs not Sampled:	0
# of SIUs in SNC with Pretreatment Standards:	0
# of SIUs in SNC with Reporting Requirements:	0
# of SIUs in SNC with Pretreatment Compliance Schedule:	0
# of SIUs Published in newspaper:	0
# of SIUs with Compliance Schedules:	0
# of Violation Notices Issued to SIUs:	0
# of Administrative Orders Issued to SIUs:	0
# of Civil Suits Filed Against SIUs:	0
# of Criminal Suits Filed Against SIUs:	0
# of Categorical Industrial Users:	2
# of CIUs in SNC:	0

Penalties

# of IUs from which Penalties have been Collected:	0
Total Dollar Amount of Penalties Collected:	$0.00

Item 3. Updated List of All Industrial Users By Category

LYNN WATER AND SEWER COMMISSION INDUSTRIAL USERS

INDUSTRY * = Significant Industrial User (SIU)	Effluent Characteristics	SIC Code	Permit Number	Expiration Date	Avg Flow: GPD
BWBC I LLC DBA Bent Water Brewing Company 180 Commercial St. Unit 18 Lynn, MA 01905	Wastewater from the manufacturing and brewing of beer and clean-up activities such as floor and equipment washing.	2082	LN 028	9/30/2023	550
C. L. Hauthaway & Sons Inc. 638 Summer St. Lynn, MA 01905	Wastewater from the manufacturing of urethane based adhesives and coatings.	2891	LN 019	9/30/2023	300
Demakes Enterprises Inc. * 37 Waterhill St Lynn, MA 01905	Wastewater from various meat cutting and packing operations, and floor and machine wash.	2013	LS 007	9/30/2023	35,000
Durkee Mower Inc. 2 Empire St. Lynn, MA 01903	Wastewater from the wash down of the marshmallow-fluff processing area.	2099	LN 021	9/30/2023	1,500
General Electric Company * 1000 Western Ave. (GEAE) Lynn, MA 01910	Pretreated wastewater from the Bldg. 32 oily water treatment area, Bldg. 64 treatment ground water treatment system, condensate, cooling water, and domestic wastewater.	3724, 3511	LC 006	9/30/2023	250,000
General Electric Co. * 40 Federal St. Lynn, MA. 01905	Wastewater from ground water remediation	3724	LGR 031	9/30/2023	100,000
Kettle Cuisine LLC- Lynn * 330 Lynnway Lynn, MA 01905	Wastewater from the manufacturing of soup products (chili, chowder, stew) and wash down of process equipment.	2099	LS 015	9/30/2023	90,000
Lynn Manufacturing Inc. 15 Marion Street Lynn, MA 01905	Filtered wastewater from the binding of ceramic fibers	3299, 5070	LN 018	9/30/2023	13,000
National Grid LNG Tank 255 Blossom St. Lynn, MA	Wastewater from non contact cooling tower heat exchanger drawdown, LNG vaporizer discharges, and fire suppression system test residual discharge	4924	LN 027	9/30/2023	150

Wheelabrator Saugus J.V 100 Salem Turnpike Saugus, MA 01906	*	Treated landfill leachate wastewater	4953	SC 013	9/30/2023	225,000
		AVERAGE DAILY FLOW				**0.72 MGD**

Item 4. Summary of Enforcement Activities

A. & B. Facilities Inspection and Sampling Dates.

Per the 20 year operation and maintenance contract agreement between the Lynn Water & Sewer Commission and Veolia Water (formerly U.S. Filter) effective July 1, 2001, sampling and inspection duties for IPP purposes are performed by Veolia Water personnel. A copy of this agreement is attached as Appendix A.

In Appendix B, please find the Lynn Water & Sewer Commission Industrial Users 2017 sampling and inspection dates as prepared by Veolia Water.

C. Compliance Schedules, Administrative Orders, and Notice of Violations Issued

For the period from February 1, 2021 to January 31, 2022, no Compliance Schedules were issued.

Written Notices of Violations

2021 Spring Semi-Annual Sampling Violations

Industry	Violation #	Parameter	Permit Limit	**Actual Recorded Value**	Sample Date	NOV Issued
None						

2021 Fall Semi-Annual Sampling Violations

Industry	Violation #	Parameter	Permit Limit	**Actual Recorded Value**	Sample Date	NOV Issued
None						

C. Compliance Schedules, Administrative Orders, and Notice of Violations Issued (con't)

2021 Commission Sampling Violations

Industry	Violation #	Parameter	Permit Limit	**Actual Recorded Value**	Sample Date	NOV Issued
None						

D. Administrative Orders Issued

For the period from February 1, 2021 to January 31, 2022, no administrative orders were issued.

E. Criminal or Civil Suits filed

For the period from February 1, 2021 to January 31, 2022, no criminal or civil suits were filed.

F. Penalties Obtained

For the period from February 1, 2021 to January 31, 2022, no penalties were collected.

Item 5. List of Significantly Violating Industries Published in Newspaper

For the period from February 1, 2021 to January 31, 2022, no industries were published in the local newspaper as being in significant non-compliance, based on 40 CFR 403.8f(vii).

Item 6. Summary of Pollutant Analytical Results

A. Influent Sampling Results Versus Threshold Inhibitory Concentrations

Sample Date: 2/24/2021

Parameter	Influent Sample #1. (mg/l)	Threshold Concentration (mg/l)
Cyanide	0.011	0.1
Arsenic	ND	0.1
Cadmium	ND	1.0
Chromium	0.009	1.0
Copper	0.138	1.0
Lead	0.019	0.1
Mercury	0.0002	0.1
Nickel	0.009	1.0
Silver	ND	0.25
Zinc	0.896	0.08

B. Effluent Sampling Results Versus Water Quality Standards

Sample Date: 2/24/2021

Parameter	Effluent Sample #1. (mg/l)	Water Quality Standard (mg/l)
Cyanide	ND	0.001
Arsenic	ND	0.036
Cadmium	ND	0.0093
Chromium	ND	0.002
Copper	ND	0.0029
Lead	ND	0.0056
Mercury	ND	0.00025
Nickel	ND	0.0083
Silver	ND	0.0023
Zinc	0.077	0.086

Notes: Influent sample consisted of one 24-hour time composite sample and one grab sample for total cyanide. Threshold Inhibitory Concentrations are based on values presented in EPA, Guidance Manual on the Development and Implementation of Local Discharge Limitations under the Pretreatment Program, 1987, Table 3-2. Water quality values are based on the most stringent of the acute or chronic toxicity values set forth in EPA, Guidance Manual on the Development and Implementation of Local Discharge Limitations under the Pretreatment Program, 1987, Table 3-1.

Item 7. Description of All Interference and Pass-Through

The Commission did not experience interference or pass-through at the Lynn Regional Wastewater Treatment Plant (WWTP) during the 2021 reporting period.

Item 8. Investigation into Interference and Pass-Through

The Commission POTW did not experience interference or pass-through therefore there was no need to investigate interference or pass-through during the 2021 reporting period.

Item 9. Description of Monitoring to Prevent Interference and Pass-Through

The Commission continues to implement an effective program to prevent and detect the occurrence of interference and pass-through. Commission staff is available 24 hours per day for any emergency. The Commission closely monitors industrial users through sampling and inspection programs, meetings, and correspondence. The Commission performs random testing on trucked or hauled waste, monitoring the Fats, Oils and Grease content of grease trap pump-outs and their potential to upset the POTW.

The Commission samples three domestic background locations throughout the city of Lynn to evaluate the wastewater coming from non-regulated commercial and domestic sources.

The Commission continues to send task teams to sample sewers and drains after an inspection, accident, or complaint had indicated oil, dye, or other pollutants in the waste stream. The Commission uses the services of Enpro Services, Inc. and Clean Harbors to provide cleaning and disposal of hazardous materials when found in catch basins and manholes to prevent interference and pass-through at the POTW. The Commission will continue to work with its legal counsel and the proper authorities to prosecute the perpetrators of illegal dumping activities to prevent such occurrence from taking place in the future.

Item 10. Actions Taken to Reduce the Incidence of Significant Violations

The Commission continues to see improvement in the reduction of Industrial Users in Significant Non-Compliance.

In an effort to recover associated POTW costs, the Commission continues to implement a surcharge system for excess solids loading and BOD at the POTW. For the period from February 1, 2021 to January 31, 2022, the Commission collected $43,647.85 from industrial users discharging wastewater with concentrations of conventional pollutants BOD, TSS.

Item 11. Local Limits Implementations

The Commission submitted a Local Limits re-evaluation to USEPA on August 30, 2007. The Commission received formal EPA approval for same on November 19, 2007.

Local Limits

Date of Most Recent Technical Evaluation of Local Limits: August 30, 2007

Date of Most Recent Adoption of Technically Based Local Limits: November 19, 2007

Pollutant	Limit (mg/l)	MAHL (lb/day)
Arsenic	0.11	23.7
Cadmium	0.18	38.7
Chromium (Hexavalent)	0.024	5.16
Chromium (Total)	0.2	43
Copper	0.22	47.3
Cyanide	0.022	4.73
Lead	0.16	34.4
Mercury	0.00043	0.0925
Nickel	0.1	21.5
Silver	0.12	25.8
Zinc	0.56	120.5

NOV Documentation and Correspondence

There were zero (0) notice of violations issued to Industrial Users of the Commission sanitary sewer system for the 2021 reporting period.

APPENDIX A.

Industrial Pretreatment Standards for 20-Year O&M Contract Between Lynn Water and Sewer Commission, Veolia Water North America, Suez Water North America

APPENDIX 14
INDUSTRIAL PRETREATMENT PROGRAM STANDARDS

Appendix 14 sets forth the Industrial Pretreatment Program (IPP) standards to be adhered to and followed by the Company in providing assistance to the Commission in its management and administration of the IPP. The division of responsibility between the Company and Commission and those functions that remain under the management of the Commission are detailed in Section 7 of this Service Contract.

14.1 TRANSITION DUTIES

Prior to the Commencement Date, the Company shall, in cooperation with the Commission and the current IPP Contract Administrator, arrange for an orderly transition of IPP administrative responsibility. Immediately thereafter, the Company shall review and familiarize itself with the existing computerized database of all businesses of known or potential significance to the pretreatment program, including the Standard Industrial Classification (SIC) codes for potential Industrial Users ("IUs"); list of industries classified as IUs based on the pretreatment program final report and data obtained under item (2) above; the computerized data storage and reporting system, which includes for each IU the industry name and location; name, telephone number, and address of responsible contact person; SIC classification, permit number, pollutant discharge limits for each facility and dates on which limits were proposed promulgated; historical data on inspections, sample analyses, violations, and violation resolutions; the existing permit application form; and, permissible pollutant discharge limits for each IU included in the [MIP], which were established based on the NPDES Permit, the Commission's Sewer Use Regulation, EPA categorical pretreatment standards, protection of the collection system, and protection of the biological treatment processes and Plant Sludge disposal at the Wastewater Treatment Plant.

14.2 COMPANY'S IPP RESPONSIBILITIES

14.2.1 Program Goals

The goals of the Company's IPP responsibilities shall be to:

- Minimize industrial pollution entering the wastewater collection system.
- Analyze overall industrial pollution trends.
- Inform and educate industrial and residential users on pollution prevention.

The immediate objective of the Industrial Pretreatment Program shall be to adhere to and enforce the following regulations:

- General Pretreatment Regulations – 40 CFR 403
- Federal Categorical Pretreatment Standards 40 CFR 405-471
- Massachusetts Requirements – 314 CMR 7.00, 12.00, 12.08
- Lynn Sewer Use Regulation

14.2.2 Program Description

A DEP-certified industrial pretreatment coordinator will manage and administer the Commission's Industrial Pretreatment Program. All analytical procedures will be conducted in accordance with federal regulations in 40 CFR Part 136. The Company's laboratory quality assurance and control program will be followed at all times to promote representative sampling and accurate data analysis.

The Company shall assist the Commission in the enforcement of all pretreatment regulations, including waste minimization. Additionally, the Company shall work with the Commission to increase revenues through the surcharge program and through other cost recovery assessment measures for IU found in violation of their permits or who exceed their proportional pollutant loadings to the Wastewater Treatment Plant. The Company's program shall include the following services:

- Sufficient sampling personnel, transfer of custody and shipment and safety equipment to satisfy IPP requirements.

- Developing a baseline condition through initial sampling and analyzing of the City'sIUs.

- Annual inspection of the 18 significant IUs, including sampling and analysis for all NPDES permit, Sewer Use Regulation, and federal categorical parameters.

- Inspection upon receipt of permit applications for all newIUs. Company shall review all permit applications, furnish all pertinent data and make recommendations to the Commission relative to the issuance of a permit and the approval of such sewer connections. Recommendations shall include permissible pollutant discharge limits, self-monitoring schedules where applicable, pretreatment processes, and pretreatment implementation schedules, and the establishment of sampling points by the industry, if required.

- Annual domestic sampling.

- Annual sampling and analyses of the System Influent and System Effluent, and additional sampling and analyzing whenever a problem is noted at the Wastewater Treatment Plant. The Company shall attempt to ascertain the nature and origin of any non-permitted discharge that is detected.

- Assistance for all IUs with compliance activities.

- Assistance in preparation of periodic status reports containing sufficient data to satisfy applicable public participation requirements of the IPP, and review the reports with the Commission.

- Providing engineering data required by IUs included in the IPP to assist in developing and implementing the IUs pretreatment facilities.

The Company shall ensure that the pretreatment filing and database systems are up-to-date and that all necessary information is kept in a central location at the Wastewater Treatment Plant.

14.3 FIELD INSPECTION, FLOW MONITORING AND FLOW SAMPLING

The Company shall provide as required a pretreatment program inspector and sample technician to observe, inspect, and collect wastewater samples at IUs included in the pretreatment program, and to report on compliance with the IPP requirements. The furnishing or monitoring of inspection reports on any aspect of the IPP shall not make the Company responsible for an IU's failure to comply with any permit issued, compliance schedule, or violation abatement order. As part of its field inspection, flow monitoring and flow sampling duties, the Company shall:

1. Conduct periodic routine and unannounced inspections of all IUs at least twice per year or otherwise directed by the Commission.

2. Monitor or verify compliance with any industrial pretreatment requirements contained in a IUs discharge permit or violation notice;
3. Observe and record the operation of an IU with respect to chemicals or pollutants in use, stored, or produced by the IU;
4. Observe and record estimated wastewater flow rates and readily noticeable wastewater characteristics such as color, odor, turbidity, noticeable solids content, oils and grease, etc.
5. Make appropriate flow measurements or field analyses for such parameters as temperature, pH, and explosive fumes using a LEL;

6. Collect, prepare, label, preserve, and transport wastewater samples for laboratory analysis, with samples labeled in code to prohibit source identification;
7. Investigate pollutants found in System Influent that create Wastewater Treatment Plant Upsets or that appear to be non-permitted discharges, and assist in locating and identifying sources of the discharge and recommend appropriate actions; and,
8. Prepare and maintain daily and weekly reports to be used by the Commission IPP manager in analyzing permit compliance, and in preparing periodic status reports, as necessary, for the Commission.

14.4 LABORATORY ANALYSES OF WASTEWATER SAMPLES

The Company shall engage a competent analytical laboratory with appropriate certifications to conduct laboratory analyses and to report their findings to the Company. The laboratory will perform all required analyses in accordance with EPA protocols. The analysis of each sample will vary depending upon the IU being monitored.

14.4.1 Transfer of Custody and Shipment

The Company shall adhere to the following chain of custody procedures:

- When transferring possession of samples, the transferee must sign and record the date and time on the chain of custody record (use currently approved chain of custody record). In general, custody transfers are made on each individual sample, although samples may be transferred as a group, if desired. Every person who takes custody must fill in the appropriate section of the chain of custody record. The number of transfers shall be kept to a minimum.

- The person taking the sample is responsible for properly packing and dispatching the samples to the appropriate laboratory for analysis. This responsibility includes filling out, dating and signing the appropriate portion of the chain of custody record.

- All packages sent to the laboratory must be accompanied by the chain of custody record and other pertinent forms. A copy of these forms shall be retained by the originating office.

- Mailed packages shall be sent with return receipt requested. If sent by common carrier, receipts are returned as part of the permanent chain of custody documentation.

- Shipped samples shall be properly packed to prevent breakage, and the package sealed or locked so that any evidence of tampering may be readily detected.

14.5 INDUSTRIAL WASTEWATER SAMPLING

The Contractor shall furnish all labor and safety equipment necessary for the acquisition of industrial wastewater samples and reporting thereof to the Commission as stipulated below:

14.5.1 Sampling Crew Requirements

The Company shall provide a one (1) person crew consisting of one (1) Massachusetts Grade 4 or higher certified operator with experience in industrial wastewater sampling protocol. The operator shall be familiar with sampling techniques for all EPA priority pollutants, but not necessarily limited to, the following; conventional pollutants, metals, volatile organic, acid/base neutrals and acid extractable.

The Company shall provide a two (2) person crew consisting of one (1) Massachusetts wastewater certified Grade 4 Operator with experience in industrial wastewater sampling protocol and familiarity with safety requirements in confined spaces, and one(1) operator in training to assist the Grade 4 operator with sampler set-up. The operator Grade 4 shall be familiar with sampling techniques for all EPA priority pollutants including, but not necessarily limited to, the following; conventional pollutants, metals, volatile organic, acid/base neutrals and acid extractable.

The Company shall provide a three (3) person crew consisting of a two (2) person crew with an additional operator in training.

One (1) person crew shall be utilized where a IU has provided a sampling location that requires minimal effort to access; a two (2) person crew shall be utilized where an IU has provided a monitoring station, specifically when entrance to a confined space is not required; three (3) person crew shall be utilized where the IUs discharge is within a confined space (e.g., manhole) where no monitoring station has been provided.

The Commission has identified and estimated annual sampling crew requirements that are presented in Table A14-1. The Company shall be responsible for providing sufficient sampling personnel to satisfy the IPP requirements.

Table A14-1: IPP Sampling Requirements: Industries, Outfalls, and Crew Required

INDUSTRY	OUTFALL		CREW
Durkee Mower Inc	001	0	1
General Electric Federal Street	001	M.S.	1
General Electric (Western Avenue)			
Heil Separator	002-A	0	2
TCH Ground Water	002-B	0	1
Bennett Street	001	M.H	3
Western Ave.	003	M.H.	3
Atlanticare (Lynnfield St.)			
Lynnfield St.	006	M.H.	3
Lynnfield St.	008	M.H.	3
Woodland Ave.	009	M.H.	2
Uni-Graphics Inc.	001	0	1
Eastern Tool	001	M.S.	2
Whytes Laundry	001	M.S.	1
Boyd Acquisition Co.	001	M.S.	1
E. Demakes	001	0	1
	002	0	1
T.D.F. Metal Finish	001	M.S.	1

Lynn Plastics Corp.	001	0	1
Eastern Smelting & Refining			
Scrubber	001	M.S.	1
Platinum Lab	002	0	1
West Lynn Creamery	001	M.S.	1
Resco	001	M.H.	3
C.L. Hauthaway & Sons	001	0	1
New England Color Lab	001	0	1
Lynn Products	001	0	1
Preferred Poultry	001	M.S.	1
Walmart Inc.	001	M.S.	1
Domestic Sampling	001	M.H.	3
	002	M.H.	3
	003	M.H.	3
Water Treatment Plant	001	0	1

Notes: (1) Manhole = M.H.
Monitoring Station = M.S.
Other = O

In addition to the above sampling requirements, at least twice per year the Company shall sample at manholes or sewer lines that service primarily commercial areas in the Service Territory as determined by the Commission.

14.5.2 Industrial Sampling Report

The Contractor shall be responsible for submission to the Commission of an industrial sampling report. The information on each report shall include the following:

- Sample site location, discharge, and facility;
- Name of collector(s); and all personnel present;
- Date and time of collection;
- Indication of grab or composite sampling with appropriate time and volume information including type of sample bottle utilized;

- Identification of parameter to be analyzed;

- Preservative used

- Indication of any unusual condition at the sampling location and/or in the appearance of the wastewater.

- Notation of conditions such as pH, temperature, chlorine residual, and appearance that may change before the laboratory analysis, including the identification number of instruments used to measure parameters in the field.

- Analytical methods for all analyses performed by the Company such as pH, temperature, chlorine residual, etc.

14.6 INDUSTRIAL FACILITY INSPECTIONS

The Company shall furnish all labor and safety equipment necessary for conducting industrial inspections and reporting thereof to the Commission as stipulated below:

14.6.1 Inspection Crew Requirements

The following are the annual inspection crew requirements (not including Commission personnel):

Two (2) person crew shall consist of one (1) Massachusetts Grade 4 - industrial or higher certified operator with experience in industrial protocol and familiarity with industrial safety practices, and one (1) operator in training to assist the operator with the inspection. The certified operator shall be familiar with industrial operations, pretreatment systems, chemical storage and handling including containment practices, evaluation of Plant Sludge discharge,

potential Hazardous Substances handling and storage requirements, and have some knowledge of pollution prevention.

The annual inspection requirements are summarized in Table A14-2.

Table A14-2: Industrial Annual Inspection Requirements

INDUSTRY	NO. OF INSPECTIONS	INSPECTION HOURS
Atlanticare, Lynnfield St.	1	2
Boyd Acquisition Corp.	1	2
E. Demakes	1	3
Durkee Mower, Inc.	1	1.5
Eastern Smelting & Refining	1	2
Eastern Tool and Stamping	1	2.5
General Electric Company-Federal St.	1	1
General Electric Company-Western Ave.	4	10
C.L. Hauthaway & Sons	1	2.5
Lynn Plastics Corp.	1	2.5
Lynn Products Corp.	1	1
New England Color Labs	1	1
Preferred Poultry	1	1.5
Resco	1	2.5
TDF Metal Finishing	1	3
Uni-Graphics,Inc.	1	3
West Lynn Creamery	1	3.5
Whytes Laundry	1	2

14.6.2 Industrial Inspection Report

The Company shall be responsible for submission, to the Commission, of a detailed Industrial Pretreatment Compliance Inspection Report for every inspection.

The Company shall submit the written report to the Commission's Pretreatment Coordinator within 30 days from the date of inspection. At a minimum, the report shall include the following.

1. Inspection information: inspection date and personnel.
2. Industry information: facility name, address, phone number.
3. Industrial contact: Company staff responsible for conducting inspection.
4. Discharge location(s): description of outfalls and observations taken during inspection.
5. Sampling location: accessibility, needs, potential problems, etc.
6. Observation of operational areas: description and observation of operation areas.
7. Pretreatment system: description and observation of pretreatment system.
8. Chemical storage evaluation: description and observation of chemical storage locations within the facility.
9. Waste storage and handling: description and observation of storage and disposal of non-Hazardous Substances.
10. Hazardous Substances handling: description and observation of storage and disposal of Hazardous Substances including, storage areas, condition of drains, labeling, manifests and containment, etc.
11. Sludge potential: evaluation of facility's potential to produce a Plant Sludge discharge.
12. Pollution prevention/waste reduction: evaluation of facility, its needs and actions taken to reduce pollution, i.e. waste minimize, product substitution etc.
13. Inspection results: summary of observations and deficiencies, including violations noted.

B.4 INDUSTRIAL PRETREATMENT PROGRAM ASSISTANCE

B.4.1 Industrial Wastewater Sampling

The Contractor shall furnish all labor and safety equipment necessary for the acquisition of industrial wastewater samples and reporting thereof to the Lynn Water and Sewer Commission as stipulated below:

Sampling Crew Requirements

The Lynn Water and Sewer Commission has estimated the following sampling crew requirements:

- One (1) person crew shall consist of one (1) Massachusetts Grade 4 or higher certified operator with experience in industrial wastewater sampling protocol. The operator shall be familiar with sampling techniques for all EPA priority pollutants, but not necessarily limited to, the following; conventional pollutants, metals, volatile organic, acid/base neutrals and acid extractable.
- Two (2) person crew shall consist of one (1) Massachusetts wastewater certified Grade 4 Operator with experience in industrial wastewater sampling protocol and familiarity with safety requirements in confined spaces, and one (l1) operator in training to assist the Grade 4 operator with sampler set-up. The operator Grade 4 shall be familiar with sampling techniques for all EPA priority pollutants including, but not necessarily limited to, the following; conventional pollutants, metals, volatile organic, acid/base neutrals and acid extractable.
- Three (3) person crew shall consist of a two (2) person crew with an additional operator in training.

It is anticipated that a one (1) person crew shall be utilized where an industrial user (I.U.) has provided a sampling location that requires minimal effort to access; a two (2) person crew shall be utilized where an Industrial User (I.U.) has provided a monitoring station specifically when entrance to a confined space is not required; three (3) person crew shall be utilized where the I.U.'s discharge is within a confined space (e.g., manhole) where no monitoring station has been provided.

The Lynn Water and Sewer Commission has identified and estimated the following annual sampling requirements in Table B-4. The Contractor shall be responsible for providing sufficient sampling

personnel to satisfy IPP requirements and to verify the currency of this information. The Company shall be responsible for verifying this information prior to submission of this Proposal.

Table B-4 IPP Firms and Inspection Requirements

User #	Industry	SIC Code	Avg Flow (GPD)	Mandatory Inspections	Contact as of 12/31/19
1	Bent Water Brewery	2082	550	2	John Strom (Brewer)
2	C. L. Hauthaway and Sons - Outfall 001	2891	300	2	Brock Veda
3	Demakes Enterprises Outfall 1 - 001 O.N.	2013	35,000	2	Dave Beals, Cell: 978-210-3134
4	Demakes Enterpirises Outfall 2 - 002 P.B.			2	
5	Demakes Enterprises Outfall 3 - 002 P.B.			2	
6	Durkee Mower	2099	1500	2	Paul Walker
7	GE Outfall 001 - Bennett St.			2	Brendan May Matt Dam
8	GE Outfall 003 - Western Ave.	3724, 3511	250,000	2	Brendan May Matt Dam
9	GE Outfall 002 - Heil Separator			2	
10	GE Outfall 001-A - Building 64			2	
11	General Electric-Outfall - 001 - Federal St	3724	100,000	2	Chris Coner
12	Kettle Cuisine	2099	90,000	2	Nick Colcemian Eric Mosonyi
13	National Grid (Keyspan) Ener Delivery [	4924	150	2	Liz Praught
14	Lynn Manufacturing	3299, 5070	13,000	2	Steve Brown
15	Union Hospital Outfall 1 - 006			2	Sandy Votano
16	Union HospitalOuttfall 2 - 008			2	
17	Union HospitalOutfall 3 - 009			2	
18	Wheelabrator Saugus (RESCO)	4953	225,000	2	Matt Hughes
19	Lynn Water Plant			2	Bob Dawe
20	47 Dartmouth & Arvidson Street			2	
21	Keslar & Rollin Ave.			2	
22	15 Lexington St.			2	
23	Total infuent / metals & Cyanide			2	
24	Final Effluent / metals & Cyanide			2	

Industrial Sampling Report

The Contractor shall be responsible for submission to the Lynn Water and Sewer Commission of an Industrial Sampling Report. The information on each report shall include the following:

- Sample site location, discharge, and facility;
- Name of collector(s); and all personnel present;
- Date and time of collection;
- Indication of grab or composite sampling with appropriate time and volume information including type of sample bottle utilized;
- Identification of parameter to be analyzed;
- Preservative used;
- Indication of any unusual condition at the sampling location and/or in the appearance of the wastewater;
- Notation of conditions such as pH, temperature, chlorine residual, and appearance that may change before the laboratory analysis, including the identification number of instruments used to measure parameters in the field;
- Analytical methods for all analyses performed by the Company such as pH, temperature, chlorine residual, etc.

Transfer of Custody and Shipment

The Company shall adhere to the following chain of custody procedures:

- When transferring possession of samples, the transferee must sign and record the date and time on the chain of custody record (use currently approved chain of custody record). In general, custody transfers are made on each individual sample, although samples may be transferred as a group, if desired. Every person who takes custody must fill in the appropriate section of the chain of custody record. The number of transfers shall be kept to a minimum.
- The person taking the sample is responsible for properly packing and dispatching the samples to the appropriate laboratory for analysis. This responsibility includes filling out, dating and signing the appropriate portion of the chain of custody record.
- All packages sent to the laboratory must be accompanied by the chain of custody record and other pertinent forms. A copy of these forms shall be retained by the originating office.
- Mailed packages shall be sent with return receipt requested. If sent by common carrier, receipts are returned as part of the permanent chain of custody documentation.
- Shipped samples shall be properly packed to prevent breakage, and the package sealed or locked so that any evidence of tampering may be readily detected.

Notification Requirements

In the event that the sampling results indicate that an Industrial User is in violation of its Industrial Wastewater Discharge Permit, the Company shall notify the Lynn Water and Sewer Commission Pretreatment Coordinator by telephone within 24 hours of violation detection.

Person-Hour Requirements

It is estimated that the assistance specified in the foregoing paragraphs requires approximately 120 person hours per year of field time. Such estimate is a general guideline provided for informational purposes only. The Company shall include in its Proposal all costs associated with preparing the samplers for sample acquisition, including but not necessarily limited to bottle cleaning, battery charging, sampler calibration, sample storage and packaging for shipment to the designated laboratory.

Forensic Assistance

From time to time, the Commission may request the Company to provide staff to assist the Commission to investigate and identify illicit discharges into the system. Such requests will be authorized in writing and the Commission will compensate the Company in accordance with Price Proposal Form 1 (which will be an attachment to the Service Fee).

Flow Data

The Company shall be responsible for obtaining, from the industry, the flow data associated with the samples collected for the industry being sampled.

Laboratory Costs

The Company shall pay for all laboratory analysis costs for samples collected under the Industrial Pretreatment Program.

B.4.2 Industrial Facility Inspections

The Company shall furnish all labor and safety equipment necessary for conducting industrial inspections and reporting thereof to the Lynn Water and Sewer Commission as stipulated below:

Inspection Crew Requirements

The Lynn Water and Sewer Commission has estimated the following annual inspection crew requirements not including Lynn Water and Sewer Commission personnel:

Two (2) person crew shall consist of one (1) Massachusetts Grade 4 - industrial or higher certified operator with experience in industrial protocol and familiarity with industrial safety practices, and one (1) operator in training to assist the operator with the inspection. The certified operator shall be familiar with industrial operations, pretreatment systems, chemical storage and handling including containment practices, evaluation of Sludge discharge, potential hazardous waste handling and storage requirements, and have some knowledge of pollution prevention. The Company may wish to review the Lynn Water and Sewer Commission completed inspection reports that are kept on file to better familiarize itself with the scope of work.

Industrial Inspection Report

The Company shall be responsible for submission, to the Lynn Water and Sewer Commission, of a detailed Industrial Pretreatment Compliance Inspection Report. At a minimum, the report shall include the following.

1. Inspection information: inspection date and personnel.

2. Industry information: facility name, address, phone number.
3. Industrial contact: person responsible for conducting inspection.
4. Discharge location(s): description of outfalls and observations taken during inspection.
5. Sampling location: accessibility, needs, potential problems, etc.
6. Observation of operational areas: description and observation of operation areas.
7. Pretreatment system: description and observation of pretreatment system.
8. Chemical storage evaluation: description and observation of chemical storage locations within the facility.
9. Waste storage and handling: description and observation of storage and disposal of non-hazardous waste.
10. Hazardous waste handling: description and observation of storage and disposal of hazardous wastes including, storage areas, condition of drains, labeling, manifests and containment, etc.
11. Sludge potential: evaluation of facility's potential to produce a Sludge discharge.
12. Pollution prevention/waste reduction: evaluation of facility, its needs and actions taken to reduce pollution, i.e. waste minimize, product substitution etc.
13. Inspection results: summary of observations and deficiencies, including violations noted.

Reporting

The Company shall submit the written report to the Lynn Water and Sewer Commission's Pretreatment Coordinator within 30 days from the date of inspection.

Labor Requirements

The Company shall recognize that the assistance specified in the ongoing foregoing paragraphs requires field time and office time. The Company shall include all costs for performing the inspection and preparing the reports including secretarial labor (e.g. typing).

Notification Requirements

In the event that a violation of the Lynn Water and Sewer Commission's Rules and Regulations has been detected during an inspection, the Company shall notify the Pretreatment Coordinator by telephone within 24 hours from the time of inspection.

APPENDIX B.

Sampling and Inspection dates for Lynn Water & Sewer Commission Industrial Users 2021 as prepared by Suez Water.

Lynn Water and Sewer Commission Industrial Users 2021 and Dates Record 2022

Industry User	Note	Unannounced Inspection	Inspected	First Sampling	Lab Results Received	Report Done	Second Sampling	Lab Results Received	Report Done	Third Sampling	Lab Results Received	Report Done	Fourth Sampling	Lab Results Received	Report Done	Contact	Phone	Email
Bent Water Brewery		9/15/2021	5/5/2021	5/6/2021			9/16/2021									John Strom (Brewer)	781-608-0425	
																Adam Golab		adam@bentwaterbrewing.com
C.L. Hauthaway and Sons - Outfall 001	Process Wastewater Discharge- Occasional overflow from chiller tank & process steam	7/22/2021	1/20/2021	1/20/2021			7/22/2021									Brock Veda; Joe Cacciola;	781-592-6444	Jcacciola@hauthaway.com
C.L. Hauthaway and Sons - Outfall 002	no discharge per memo from Neal Johnson on 2/15/06, no longer requires monitoring or sampling - system offline since Jan. 2000																	
Demakes Enterprises Outfall 1 - 001 O.N.	to be done within first 15 days in Jan, Apr, July, Oct	11/17/2021	9/29/2021	1/13/2021			5/12/2021			9/29/2021			11/18/2021			Dave Beals	781-417-1125	
Demakes Enterprises Outfall 2 - 002 P.B.	to be done within first 15 days in Jan, Apr, July, Oct	11/17/2021	9/29/2021	1/13/2021			5/12/2021			9/29/2021			11/18/2021					
Demakes Enterprises Outfall 3 - 003 P.B.	to be done within first 15 days in Jan, Apr, July, Oct	11/17/2021	9/29/2021	1/13/2021			5/12/2021			9/29/2021			11/18/2021					
Durkee Mower		2/10/2021	2/10/2021	2/10/2021			6/16/2021									Paul Walker	781-593-8007	
GE Outfall 001 - Bennett St		10/13/2021	4/21/2021	4/21/2021			10/13/2021									Norm Pelletier	781-599-1300	
																In charge: Matt Dam	781-594-0100	
GE Outfall 003 - Western Ave		10/13/2021	4/21/2021	4/21/2021			10/13/2021									Brendan May	781-599-1300	
																Jolanta Wojas;		GE-JolantaWojas@ge.com
General Electric- Outfall 001 - Federal St		10/27/2021	4/28/2021	4/28/2021			10/27/2021									Max Tuttle	603-344-4011	
																Chris Coner	978-430-0808	chrisconer@tetratech.com
Kettle Cuisine		11/10/2021	5/19/2021	5/19/2021			11/10/2021									Nick Colcemian	781-539-2679	
																Rudy Martinez		rmartinez@kettlecuisine.com
																in charge: Eric Mosonyi	781-309-3391	
Lynn Manufacturing		9/1/2021	2/24/2021	2/24/2021			9/1/2021									Eric Gemme		eric.g@lynnmfg@.com
National Grid (Keyspan) Energy Delivery	per LWSC memo on 2/15/06 requires only 1 sample and 1 unannounced inspection (low flow user)	4/20/2021	4/20/2021	4/20/2021												Liz Praught	781-584-7350	
																Steve Brown	781-593-2500	
Wheelabrator Saugus (RESCO)	sample time @ 09:00			3/25/2021												Matt Hughes	781-233-7600	
																Joe Brady		jbrady@wtienergy.com
Lynn Water Plant	no permit / inspection not required			5/26/2021												Bob Dawe	781-595-5200	
47 Dartmouth & Arvidson St - 001	requires only 1 sample per LWSC			##########														
Keslar & Rollin Ave - 002	requires only 1 sample per LWSC			##########														
15 Lexington - 003	requires only 1 sample per LWSC			##########														
Total Influent / Metals & cyanide				2/24/2021														
Final Effluent Metals & Cyanide				2/24/2021														